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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

Stipulation for Dismissal

Plaintiff,

v.

ROBERT ALAN PFAFF et al.,

Defendants.

IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto and their respective attorneys that the following facts are not in dispute and, subject to the approval of the Court, and if the Court awards judgment, shall be incorporated into the Court's Findings of Fact and Conclusions of Law:

1. Tracie L. Burger was named as a defendant because she may claim an interest in the real property referenced in Count VII of the Complaint.
2. By Deed of Reconveyance recorded in Polk County, Oregon on March 14, 2025, Tracie L. Burger relinquished any interest she had in the real property referenced in Count VII of the Complaint.

3. Any sale of the real property referenced in Count VII of the Complaint under a judgment entered in this case shall be made free and clear of the interests of Tracie L. Burger.
4. The United States agrees and consents to a dismissal of Tracie L. Burger from this case with prejudice and without costs or fees to any party.

Dated: March 18, 2025

s/Michael R. Pahl
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Dated: March 18, 2025

s/Lane P. Shetterly
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